



Association of American Veterinary Medical Colleges

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November 20, 1998

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USDA/FSIS Hearing Clerk
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250-3700

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Re: Docket Number 98-45N

The membership of the Association of American Veterinary Medical Colleges (AAVMC) is pleased to submit comments on-the President's National Food Safety Initiative.

The AAVMC coordinates the affairs of the 27 US veterinary medical colleges, 4 Canadian veterinary medical colleges, departments of veterinary science, departments of comparative medicine, and animal medical centers and fosters their teaching, research and service missions nationally and internationally. The AAVMC has a primary interest is improving the quality of human and animal life by addressing the interests of producers and consumers of food and fiber, promotion of animal health, and the advancement of medical knowledge. The AAVMC endeavors to address societal concerns about food safety; advance veterinary education; improve animal health and well being; strengthen biomedical research, and enhance environmental quality.

We would like to compliment the leadership shown in bringing together different departments and agencies with various food safety responsibilities in an effort to solve the problem of food borne illness. Within the academic veterinary medical community, we feel that a collaborative effort between nationally sponsored research and regulatory enforcement is necessary to provide adequate interventions along the food safety continuum. Food safety issues must always be addressed from the farm to the table if we are going to tackle food borne illness problems and expect positive outcomes. We are encouraged-by the National Food Safety Council's commitment to collaboration across the myriad of administrative jurisdictions associated with food safety in our current governmental structure.

The membership of the Association feels that there is not enough emphasis placed on preharvest research in the existing food safety plan. While we agree that the need for consumer education is great, it can not be substituted for a clear preharvest research plan that focuses in part on animal health and the hygiene of the live animal stage of production. We can and should do more to assist farmers and ranchers produce food that minimizes food borne illness at the consumer level. We need to develop a body of knowledge from applied on-farm research that will prepare producers, extension specialists and veterinarians to be better applied practitioners of food safety for on-farm interventions.

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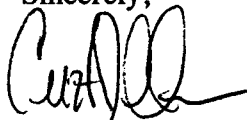
The AAVMC had previously recommended a research program that focuses on each of the six major animal product commodities, including eggs, poultry, dairy, beef, aquaculture, and swine. By promoting species specific preharvest food safety research we will be able to capitalize on the diversity of disciplines necessary to solve the modern preharvest food safety problems. Further, such a focus allows for needed flexibility in ultimately crafting solutions as one faces complex food safety problems at the live animal level. With programs that are specifically focused on preharvest food safety and animal health, we can develop a foundation of knowledge that will support new training programs both at the professional and graduate levels, so that adequate numbers of people with backgrounds working with HACCP systems, **ISO-9000** standards, and **Sanitary/Phytosanitary** Standards are in place to fulfill the growing need. The fundamental knowledge as well as the programs creating experts in food safety intervention methodologies are in high demand and sorely needed.

Finally, in mentioning Quality Assurance, we believe that the National Food Safety Initiative is missing a vital partner in preventing food borne illness. That partner is the Animal Plant Health Inspection Service (APHIS). By including this agency in the food safety program we can emphasize the need to eliminate food borne illness at the farm level. APHIS Veterinary Services maintain a level of expertise in animal health control programs that play a crucial role in reducing food borne pathogens at the farm level, and that expertise can not be taken for granted. APHIS can play an important role in protecting the nation's food supply as it moves along the safety continuum. We encourage the inclusion of this agency in future Food Safety Council discussions.

Again the membership of AAVMC would like to congratulate the National Food Safety Council on the progress made thus far. We hope that our comments will be taken into consideration, and we look forward to working with the various agencies in ensuring that this nation continues to have a safe and abundant food supply.

With kind regards, I am

Sincerely,

A handwritten signature in black ink, appearing to read "Curt J. Mann", with a stylized flourish at the end.

Curt J! Mann, D.V.M.

Executive Director